



THE CITY OF NEW YORK  
**LAW DEPARTMENT**  
100 CHURCH STREET, Rm. 3-177  
NEW YORK, NY 10007

ZACHARY W. CARTER  
*Corporation Counsel*

ARTHUR G. LARKIN  
Senior Counsel  
Phone: (212) 356-2641  
Fax: (212) 356-3509  
alarkin@law.nyc.gov

July 6, 2016

**BY ECF**

Hon. Laura Taylor Swain  
United States District Judge  
United States District Court  
500 Pearl Street  
New York, New York 10007

Re: Mark Nunez v. City of New York, et al., 11-CV-5845 (LTS) (JCF)

Your Honor:

We write with the consent of all parties and the Court-appointed monitor, and in furtherance of our two prior letter requests that Your Honor granted (Dkt. 273, 276), in order to seek an additional extension of two (2) weeks of the deadline by which the City must move for a protective order to keep confidential certain information that the Department of Correction ("DOC") has produced. The current deadline is today, July 6, 2016, and the City seeks an extension of the deadline to July 20, 2016. As we advised Your Honor previously, DOC, plaintiffs' counsel and the monitor are attempting to resolve all of the issues through negotiation, and at this point, the parties have narrowed their disputes to two areas. We expect that over the next two weeks, the parties will either resolve their differences through negotiation, or else the City will move for appropriate relief on July 20, 2016 (if Your Honor grants the requested extension). We appreciate the Court's time regarding these matters.

Respectfully submitted,

/s/

Arthur G. Larkin, Esq.  
Senior Counsel

cc: All Counsel (by ECF)